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### REMARKS

Claims 1-20 are pending in the application after this amendment adds new claims 19 and 20. Claims 1, 3, 7, 11, 12, and 16, and the Abstract are amended by this amendment to clarify the patentable subject matter and/or to correct typographic errors. No new matter is added by the amendments and new claims, which are supported throughout the specification and figures. In particular, the new claims are supported in the specification at least at page 11, lines 23-28. In view of the amendments and the following remarks, Applicants respectfully request reconsideration of the present application.

The Abstract is objected to because of grammatical errors. The Abstract has been amended as suggested by the Examiner, and it is therefore requested that the objection be withdrawn.

Claim 1 is objected to because of an informality. Claim 1 has been amended substantially as suggested by the Examiner, and it is therefore requested that the objection be withdrawn.

Claims 1-18 are rejected under 35 U.S.C. 102(b) as being anticipated by United States Patent No. 6,421,723 to Tawil (hereinafter referred to as Tawil). To be properly rejected under 35 U.S.C. § 102(b), the cited reference must teach each and every feature of the rejected claims. Applicants respectfully traverse.

Claim 1 relates to a storage system that includes, *inter alia*, one or more data storage logical units (LUs) comprising respective physical media, the one or more LUs being adapted to receive commands. Responsive to the commands, the LUs store and recall data. The storage system of claim 1 also includes a plurality of ports, each port being adapted to maintain a respective LU command queue for each of the LUs, such that upon receiving a command directed to one of the LUs, the port places the received command in the respective LU command

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*queue, converts the received command to one or more converted commands at least some of which are directed to the physical media of the one of the LUs, and conveys the at least some converted commands to the physical media in an order determined by the respective LU command queue.*

The Examiner asserts that Tawil discloses the feature of a port that places a received command in a respective LU command queue, converts the received command to one or more converted commands at least some of which are directed to the physical media of the one of the LUs, and conveys the at least some converted commands to the physical media in an order determined by the respective LU command queue (Office Action; page 4, lines 9-14). However, this section of Tawil states in its entirety:

Each of targets 18 and 20 include a command queue 22 and 26 and a data storage area 24 and 28. Command queues 22 and 26 *accept* commands known as FCP CMND from initiators associated with storage area network 12, and *execute* the commands for *storing, recalling or otherwise manipulating data* in data storage areas 24 and 28.

(Tawil; col. 4, lines 20-25; emphasis added). As is apparent from the above citation, there is no disclosure or suggestion relating to *converting* the commands. Furthermore, this appears to be the *only* discussion relating to elements 22 and 26, discussing command queues, in Tawil.

Additionally, there is no discussion in Tawil of *conveying some converted commands to the physical media in an order determined by the respective LU command queue*, as recited in claim 1. Applicants respectfully request a citation in support of this feature, or alternatively that the rejection be withdrawn.

Therefore, for at least the reasons discussed above, Tawil does not disclose or suggest all of the features of claim 1, and therefore for at least this reason claim 1 is allowable.

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Claims 2-9 depend from claim 1 and are therefore allowable for at least the same reasons as claim 1 is allowable.

Additionally, claim 3 recites, *inter alia*, that the first port conveys a first string of the at least some converted commands in a first order to the physical media, and the second port conveys a second string of the at least some converted commands in a second order to the physical media. The Examiner does not give a particularized rejection of this claim, but merely cites to the same section quoted above. As discussed above, the cited section of Tawil does not even mention converting commands, and it is therefore respectfully submitted that Tawil does not anticipate at least the additional feature of claim 3 of conveying by a port a string of converted commands in a first order to a physical media. Therefore, for at least this additional reason, claim 3 is allowable.

Claim 10 includes features similar to those discussed above in regard to claim 1, and therefore for at least the same reasons as claim 1 is allowable, claim 10 is also allowable.

Claims 11-18 depend from claim 10 and are therefore allowable for at least the same reasons as claim 10 is allowable.

Regarding all of the rejections, Applicant respectfully reminds the Examiner that it is the duty of the Examiner to specifically point out each and every limitation of a claim being rejected as per §1.104(c)(2) of Title 37 of the Code of Federal Regulations and section 707 of the M.P.E.P., which explicitly states that "*the particular part relied on must be designated*" (emphasis added) and "the pertinence of each reference, if not apparent, must be clearly explained and each rejected claim specified".

New claims 19 and 20 depend from claim 1 and are therefore allowable for at least the same reasons as claim 1 is allowable. Additionally, new claim 19 recites the feature that each

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*port uses at least one table to convert logical data* in the received command to data suitable for the respective physical media to which the command is directed. Since Tawil does not disclose or suggest converting commands, as discussed above, nor more particularly the use of a table to convert logical data, Tawil does not anticipate new claim 19.

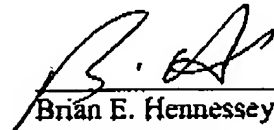
Regarding, new claim 20 recites the feature that each *port uses one or more functions to convert logical data* in the received command to the data suitable for the respective physical media. Since Tawil does not disclose or suggest converting commands, as discussed above, nor more particularly the use of a function to convert logical data, Tawil does not anticipate new claim 20.

### CONCLUSION

In view of the remarks set forth above, this application is believed to be in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

  
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